

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.: _____
v.	:	DATE FILED: _____
JONATHAN FRANCIS WILLIAMS,	:	VIOLATIONS:
a/k/a “Thomas Miller,”	:	18 U.S.C. § 1029(a)(3) (possession of
a/k/a “William Michael Bradshaw”	:	15 or more counterfeit access devices - 1
	:	count)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 5 counts)
	:	18 U.S.C. § 922(g)(2) (possession of a
		firearm by fugitive from justice - 1 count)
		Notices of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about July 7, 2005, to on or about July 21, 2005, defendant JONATHAN FRANCIS WILLIAMS used and attempted to use approximately 80 counterfeit debit/credit cards at various automatic teller machines (“ATMs”) in Southern California. During most transactions, defendant WILLIAMS withdrew and attempted to withdraw the maximum amount of cash permitted by the ATM from the compromised account connected to the counterfeit.

2. On or about March 2, 2006, defendant JONATHAN FRANCIS WILLIAMS used a counterfeit debit/credit card at an ATM in Tucson, Arizona.

3. From on or about July 7, 2005, to on or about March 8, 2006, in Lester, in the Eastern District of Pennsylvania, and elsewhere, defendant

JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”

knowingly and with the intent to defraud possessed more than 15 counterfeit access devices, that is, approximately 80 counterfeit debit/credit cards, to obtain United States currency in several states and thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(3).

COUNTS TWO THROUGH SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Lester, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”**

knowingly possessed, without lawful authority, a means of identification of another person, that is, the names identified below by initials, during and in relation to the possession of 15 or more counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(3), each identification constituting a separate count.

COUNT	NAME
2.	W. M. B.
3.	D. T. C.
4.	M. J. L.
5.	M. L.
6.	J. M. L.

All in violation of Title 18, United States Code, Section 1028A.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, at Lester, in the Eastern District of
Pennsylvania, defendant

**JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”**

while a fugitive from justice, knowingly possessed in and affecting interstate commerce, a
firearm, that is, a black Glock Model 19 9mm semi-automatic handgun bearing serial #HVD861,
with two barrels, one of which was threaded for a silencer.

In violation of Title 18, United States Code, Section 922(g)(2).

FIRST NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 1029, as set forth in Count One of this indictment, defendant

**JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B) all property constituting and derived from proceeds defendant JONATHAN FRANCIS WILLIAMS obtained, directly or indirectly, as a result of this violation, including but not limited to \$40,000 in United States currency.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any acts or omissions of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of said defendant up to the value of the above forfeiture property.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and (b)(1).

SECOND NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 1029, as set forth in Count One of this indictment, defendant

**JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 1029(c)(1)(C) any and all personal property used or intended to be used to commit the offense, including but not limited to: \$210,014 United States Currency; \$5,500 Canadian gold coin currency; One Grey Sony Vio Laptop Computer, Model: PCG-4A1L, FCC ID: AK8PCG4A1L; One Black Sony Vio Laptop Computer, Model: PCG-4E1L, FCC ID: AK8PCG4E1L, serial #28197431 3201450; One black Model 19 9mm semi-automatic handgun bearing serial #HVD861; and One GIGA Bank 2.2 GIG Jump Drive, serial #20040918474.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any acts or omissions of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1029(c)(2), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeiture property.

All pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

THIRD NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 922(g)(2), set forth in Count Seven of this indictment, defendant

**JONATHAN FRANCIS WILLIAMS,
a/k/a “Thomas Miller,”
a/k/a “William Michael Bradshaw,”**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offense, including, but not limited to a black Glock Model 19 9mm semi-automatic handgun bearing serial #HVD861, with two barrels, one of which was threaded for a silencer.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney